

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA

Alexandria Division

1:22-cv-1153



Danielle Taylor

Plaintiff)
Vs.)
) 1:22-cv-1153
Revature)
Defendant)

**Memorandum Supporting Leave to Proceed in Forma Pauperis with the Original Record
in the Court of Appeals**

Introduction

Pursuant to Rule 24 of Federal Rules of Appellate Procedure, Local Rules of the Fourth Circuit Internal Operating Procedures, Plaintiff moves for Leave to Proceed In Forma Pauperis. Pursuant to Local Rule for the Eastern District of Virginia, Alexandria Division, this memorandum is filed.

Standard of Review

“Rule 24. Proceeding in Forma Pauperis

(a) Leave to Proceed in Forma Pauperis.

(1) Motion in the District Court. Except as stated in Rule 24(a)(3), a party to a district-court action who desires to appeal in forma pauperis must file a motion in the district court. The party must attach an affidavit that:

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(A) shows in the detail prescribed by Form 4 of the Appendix of Forms, the party's inability to pay or to give security for fees and costs;

(B) claims an entitlement to redress; and

(C) states the issues that the party intends to present on appeal.

.....(b).....

(c) Leave to Use Original Record. A party allowed to proceed on appeal in forma pauperis may request that the appeal be heard on the original record without reproducing any part.”

Federal Rules of Appellate Procedure. (“F.R.A.P.”)

Requested Relief

The attached Affidavit, Exhibit A, is intended to cover F.R.A.P. Rule 24 (a)(1)(A)-(C). I've organized the Affidavit chronologically matching the rule. That is, Section I corresponds to F.R.A.P. Rule 24(a)(1)(A), Section II corresponds to F.R.A.P. Rule 24(a)(1)(B), etc.

F.R.A.P. Rule 24(b) provides a plaintiff permission to have the record heard without producing any part. If I understand this correctly, it means I can forgo the cost of providing a transcript and the creation of a new record as the existing record will be used. If this is correct then I am requesting this relief. It will save me money in terms of printing and postage. Additionally, it will save the judiciary money by not having duplicate digital storage costs.

Conclusion

For the preceding reasons, I am requesting two things. First, to proceed in Forma Pauperis for the Appeal of the March 5, 2025 decision. Second, I am requesting to have the original record heard, so long as my understanding of that provision is correct.